

United States District Court
Eastern District of North Carolina
Western Division
Civil Suit: 5:12-CV-00714-BO

FILED
MAY 28 2015
JULIE RICHARDS JOHNSTON, CLERK
US DISTRICT COURT, EDNC
BY DEP CLK

Loushonda Myers

In Propria Persona Plaintiff,

Vs.

INTERROGATORIES

THE STATE OF NORTH CAROLINA, et al

Defendants.

PLAINTIFF'S SECOND SET OF INTERROGATORIES TO KRITCH ALLEN

Plaintiff, Loushonda Myers, is now requesting that the aforementioned Defendant answer the following interrogatories, pursuant to the Federal Rules of Civil Procedure, Rule 33.

INTERROGATORIES

1. Who are the "law enforcement sources in South Carolina" mentioned in both the first and second search warrants you applied for?

Response:

2. Who established surveillance on my then residence of 19 Topsail Island Drive, Garner, North Carolina on or around October 12, 2010?

Response:

3. Who stated that “an unknown black male resembling known photos of Tyree Myers” was seen at my home on or around October 12, 2010, as stated in both of your search warrant attachments?

Response:

4. When did you “see” or “identify” Tyre or Dameon Myers at my residence on or around October 12, 2010?

Response:

5. What photos were used to state “an unknown black male resembling known photos of Tyree Myers” as contained in your search warrant attachments, and when were these photos taken?

Response:

6. Did you ever turn over any photos “resembling” Tyre Myers during discovery in my criminal matter so that I may have an opportunity to inspect?

Response:

7. Did you know of or heard of Tyre Myers, Dameon Myers, and/or myself (Loushonda Myers) prior to United States Marshal Service (also referred to herein as USMS) Agent Bryan Konig appearing on or around October 12, 2010?

Response:

8. At what point of the day on or around October 12, 2010, did you learn of the alleged insurance violation on my Mercedes Benz?

Response:

9. Was I present at the property known as 19 Topsail Island Drive, Garner North Carolina, prior to the execution of the first search warrant, and second search warrant?

Response:

10. When did Agent Bryan Konig or the USMS Agents provide you with a copy of the NCIC report, arrest warrant, and/or fugitive warrant for Tyre or Dameon Myers on or around October 12, 2010?

Response:

11. Was any video recording taken, including dash cameras, by you or any of the law enforcement officers and/or agencies involved during any of the events that occurred on and/or around October 12, 2010, including the alleged traffic stop, searches of the property known as 19 Topsail Island Drive, and/or communication with the minor children?

Response:

12. Where are the arrest warrants for Tyre and Dameon Myers for the events and/or occurrences that occurred on or around October 12, 2010?

Response:

13. Who identified me as Loushonda Myers on the morning of October 12, 2010 during an alleged traffic stop?

Response:

14. Did Captain Fish advise you to apply for either the first or second search warrant?

Response:

15. Why was a search warrant requested for both Tyre and Dameon Myers, when it was alleged that “an unknown black male resembling known photos of Tyree Myers was seen”?

Repsonse:

16. Was anyone ever seen leaving and/or entering the property known as 19 Topsail Island Drive, North Carolina on October 12, 2010? If yes, who and/or whom was seen and who and/or whom identified them?

Response:

17. Who saw someone peeking through the blinds of the home located at 19 Topsail Island Drive, Garner, North Carolina on October 12, 2010?

Response:

18. Did you enter the home located at 19 Topsail Island Drive, Garner, North Carolina on October 12, 2010 during the execution of the first search warrant?

Response:

19. Did Bryan Koing or any USMS agent enter the home located at 19 Topsail Island Drive, Garner, North Carolina during the execution of the first or second search warrant on October 12, 2010?

Response:

20. On Friday, October 8, 2010, did you personally see or know of Tyre Myers, Dameon Myers, and/or Loushonda Myers residing at the residence known as 19 Topsail Island Drive, Garner, North Carolina?

Response:

21. Who heard someone locking a door at the residence known as 19 Topsail Island Drive, Garner, North Carolina?

Response:

22. Did you provide the same information in the second search warrant for the property known as 19 Topsail Island Drive, Garner, North Carolina knowing that no fugitives were at the home after the execution of the first search warrant?

Response:

23. Who saw the alleged marijuana leaf on the laundry floor on October 12, 2010 at the residence known as 19 Topsail Island Drive, Garner, North Carolina?

Response:

24. Did Lex give any statements as to what he/she allegedly alerted to and/or allegedly smelled; and/or any notes regarding his/her involvement in the events that took place at 19 Topsail Island Drive, Garner North Carolina on or around October 12, 2010?

Response:

25. Did the United States Marshal Service initiate contact with you and/or the Johnston County Sheriff's Office? If so, when and where?

Response:

26. Does your then team, The Johnston County Sheriff's Office S.T.A.R. team specialize in fugitive capture? If yes, explain training?

Response:

27. Who called the Johnston County Department of Social Services in reference to my minor children?

Response:

28. What source(s) were used to gain knowledge that the two alleged fugitives were allegedly wanted for narcotics and robbery violations? Explain.

Response:

29. What source(s) were used to gain knowledge that the two alleged fugitives were allegedly armed and dangerous?

Response:

30. Did any agent of the United States Marshal Service assist and/or collaborate with you and/or the Johnston County Sheriff's Office in the execution of the second search warrant for 19 Topsail Island Drive, North Carolina or enter the property after the execution of the first search warrant?

Response:

CERTIFICATE OF SERVICE

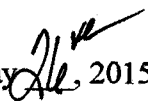
I, Loushonda Myers, certify that a copy of the foregoing Interrogatories have been served on Kritch Allen by mailing a copy to his attorney(s) Grant S. Mitchell and Ronnie M. Mitchell as follows:

Grant S. Mitchell and Ronnie M. Mitchell

(Attorneys for Defendants Sheriff Steve Bizzell, Captain A.C. Fish, Detective Kritch Allen, Detective Don Pate, Detective J. Creech, Detective J. Canady, Detective A. Case, Captain D. Daughtry, Lieutenant Stewart, Lieutenant Danny Johnson, Deputy Gillis, David Hildreth, James Gerrell, and Unknown Officers/Employees of the Johnston County Sheriff's Office)

P.O. Box 2917

Fayetteville, North Carolina 28302

May , 2015.



Loushonda Myers
Sui Juris Plaintiff, Private Attorney General
27 Wateree Trail
Georgetown, South Carolina 29440
(843) 527-2100
loushondamyers@yahoo.com